Coastal San Luis Resource Conservation District
645 Main Street, Suite F, Morro Bay, CA 93442 *phone:* 805-772-4391
web: www.coastalrcd.org

August 16, 2013

Mr. Brian Pedrotti
County of San Luis Obispo
Department of Planning and Building
976 Osos Street, Room 200
San Luis Obispo, CA 93408-2040

Re: Laetitia Revised Recirculated Draft EIR, Comments on Water Resources

Mr. Pedrotti,

Thank you for the opportunity to comment on the Revised Recirculated Draft EIR for the Laetitia Ag Cluster Subdivision. In an effort to mitigate the environmental impacts and make the proposed development beneficial to the local community, the Coastal San Luis Resource Conservation District (CSLRCD) has prepared the following comments. Please consider these comments as you prepare the Final EIR.

Our primary concern is related to flooding and sedimentation impacts as discussed in Section V.P Water Resources. The current San Luis Obispo County design standards (Storm drainage section 5.1) state that "there must not be damage to either the development site itself or any other land, either upstream or downstream. "Damage" as used here, is defined as water having sufficient depth or velocity to damage improvements or to deposit or scour soil. The proposed development project will increase stormwater flow in Arroyo Grande Creek which already has considerable flood risk and sediment concerns. Increasing the peak flow in a channel that is undersized in an area that is prone to flooding could potentially cause "damage" even if the increase is small. The standards also state that the design shall seek to improve adverse conditions that affect the site or adjacent lands where it is reasonable to do so. In the opinion of the CSLRCD, the best way to mitigate flooding and sedimentation impacts is to construct a retention / sedimentation basin to serve the development and improve conditions downstream. Our comments to specific impacts and mitigation measures are discussed below.

Flooding

The proposed development project is located on Los Berros Creek, a tributary to Arroyo Grande Creek and San Luis Obispo County Flood Zone 1/1A. The Revised Draft EIR focuses on Los Berros Creek and does not adequately address the downstream capacity constraints in Arroyo Grande Creek. In the CSLRCD's opinion, the proposed mitigation measures are inadequate to reduce flood risk in Arroyo Grande Creek to a less than significant level.

In 2006, Swanson Hydrology and Geomorphology prepared the Arroyo Grande Creek Erosion, Sedimentation and Flooding Alternatives Study for the CSLRCD with support from the County of San Luis Obispo. This study indicates that Arroyo Grande Creek has severe capacity constraints and is likely to overtop in a 5-year storm event. With such severe downstream capacity constraints, any increase in peak flow generated by the proposed development has the potential to exacerbate the existing flood risk.

We agree with WAT Impact 2 which states:

> "Implementation of the proposed project would create additional impervious surfaces, and would result in a net increase in peak stormwater discharge, resulting in a potentially significant impact."

However, we disagree with the assertion that the mitigation measures identified in WAT/mm-9 and WAT/mm-10 can reduce the potentially significant impact to a level that is less than significant. WAT/mm-9 and WAT/mm-10 require the use of Low Impact Development (LID) measures to reduce stormwater runoff. LID measures are beneficial in smaller storm events and we support their use in this project to increase infiltration and reduce hydromodification. However, LID measures are not effective at reducing runoff in large storm events and should not be considered a flood control strategy. A retention basin could effectively mitigate the increased flood risk.

Sedimentation

The 2006 Swanson Hydrology study also indicated that there is an existing sedimentation problem in the watershed. Roads are by far the most destructive element in the landscape with regard to excessive fine sediment generation. Erosion from road surfaces, ditches, and shoulders contribute sediment to creeks. Paved and unpaved roads modify local hill slope drainage patterns, concentrate flow, and increase erosion.

We agree with WAT Impact 4 which states:

> "The creation of additional impervious services may result in accelerated and concentrated stormwater runoff within natural drainages, causing gully erosion, down-gradient sedimentation, and discharge of fuel, oils, and other hydro-carbon based pollutants into sources of surface water including Los Berros Creek."

However, the proposed mitigation measures do not clearly show that this impact can be mitigated.

WAT/mm-14 states:

> "Prior to issuance of construction permits for tract improvements, the applicant shall submit plans incorporating best management practices to reduce diffuse stormwater (e.g., rip-rap or other technologies)."

Diffusing stormwater at the site does not address the implication of increased impervious surfaces on downstream resources. We believe that the proposed best management practices should be analyzed prior to approval of the EIR to adequately assess their effectiveness and fully understand the environmental impact. In our opinion, a retention / sedimentation basin could potentially reduce the impact to a less than significant level. We also request that the CSLRCD be involved in reviewing the proposed long term sediment mitigation measures prior to approval.

WAT/mm-13 states:

> "Prior to issuance of grading permits, the applicant shall incorporate Natural Resource Conservation Service (NRCS) Field Office Technical Guide (FOTG) practices into all grading, erosion, and sedimentation control plans. The NRCS or the Upper-Salinas-Las Tablas Resource Conservation District can be contacted at (805) 434-1036 for assistance in implementing FOTG practices."

Since this project is in the Coastal San Luis Resource Conservation District service area, it is appropriate for the applicant to contact the CSLRCD at (805) 772-4391 for assistance rather than the Upper Salinas-Las Tablas RCD.

Hydrology Report

In addition to reviewing the Water Resources section (Section V.P) of the Revised, Recirculated, Draft EIR, the CSLRCD reviewed the Hydrology and Hydraulic Report cited in the Draft EIR. This report was prepared by RRM Design Group and is dated January 5, 2004. In our opinion this report does not adequately evaluate the downstream impacts of the proposed project for the following reasons:

1. The report indicates that the project will "increase the net peak flow rates of stormwater runoff leaving the site", but it does not address potential flood concerns downstream of the project in Arroyo Grande Creek.

2. The report analyzes the need for on-site stormwater detention but does not evaluate possible stormwater retention.

3. The report does not include sufficient background information to illustrate the methods and assumptions used or determine the accuracy of the findings.

The CSLRCD believes that further study is warranted in order to adequately assess the potential impacts. In our opinion any hydrologic and hydraulic studies cited in the Revised, Recirculated,

Draft EIR should be appended to the document to allow the public to evaluate the adequacy of the analysis.

The Coastal San Luis Resource Conservation District continues to look for ways to work with the agricultural community to develop projects that benefit water and soil resources in our district. It is our belief that the Laetitia Ag Cluster Subdivision offers an opportunity to improve existing water quality and flooding concerns. In our opinion, this development could create or contribute runoff which would exceed the capacity of Arroyo Grande Creek and the proposed mitigation methods are inadequate to reduce this impact to an acceptable level. At a minimum, additional study should be considered to evaluate the impact of the proposed development on Arroyo Grande Creek prior to approval of the EIR. Constructing retention / sedimentation basins on the Laetitia property is the best way to mitigate flood and sediment risk to less than significant. With 1,787 acres of open space proposed, we think that this is both reasonable and feasible. Any additional analysis should include the use of retention / sedimentation basins as an alternative. Should you have any questions regarding these comments please feel free to contact us directly.

Regards,

G.W. Bates, PE, CPESC

District Engineer
Coastal San Luis Resource Conservation District
645 Main St. Suite F
Morro Bay, CA 93442
(805) 772-4391
gbates@coastalRCD.org

Neil Havlik

President of the Board
Coastal San Luis Resource Conservation District
645 Main St. Suite F
Morro Bay, CA 9344